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Long Island Rail Road

December 13, 2022

Honorable Lorna G. Schofield
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Steven Rosati v. Long Island Railroad, et al.
21-Civ.-8594(LGS)

Dear Judge Schofield:

The Metropolitan Transportation Authority ("MTA") Law Department represents defendants the Long Island Rail Road ("LIRR"), a subsidiary of the MTA, the MTA, and Patrick J. Foye in the above referenced matter. Pursuant to the Court's Individual Practice Rules, I write with the consent of plaintiff to advise the Court of the status of the case.

On October 7, 2022, defendant served on plaintiff a demand for interrogatories, notice for production of documents and a notice of deposition on plaintiff. Plaintiff responded to the demands on November 7, 2022.

On November 1, 2022, plaintiff served on defendant a demand for interrogatories and notice for production of documents. Defendant responded to on November 17, 2022 with 912 pages of documents.

Plaintiff filed a second amended complaint on October 14, 2022. Defendant filed an answer on October 21, 2022. There are currently no motions pending.

Plaintiff's deposition is scheduled for December 15, 2022. It is anticipated that the parties will complete fact discovery by February 10, 2023.

Respectfully submitted,

Kevin McCaffrey
KEVIN McCAFFREY

Assistant Deputy General Counsel

The agencies of the MTA

MTA New York City Transit
MTA Long Island Rail Road

MTA Metro-North Railroad
MTA Bridges and Tunnels

MTA Capital Construction
MTA Bus Company